

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

| | | |
|---------------------------|---|-----------------------|
| DELTA PILOTS ASSOCIATION, |) | |
| |) | |
| Plaintiff |) | |
| |) | |
| v. |) | No. 1:14-cv-00225-AKH |
| |) | |
| JOHN DOE, |) | |
| |) | |
| Defendant. |) | |
| |) | |

SECOND DECLARATION OF MICHAEL HANSON

I, Michael Hanson, declare as follows:

1. I am a pilot for Delta Airlines, Inc. (“Delta”) and am a member of the Air Line Pilots Association, International (“ALPA”). The Delta Master Executive Council (“MEC”) is ALPA’s highest local coordinating body at Delta. I am Vice Chairman of the MEC’s Strategic Planning Committee at Delta.

2. I have personal knowledge of the facts set forth in this Declaration unless otherwise indicated. I offer this Declaration in support of the ALPA’s Emergency Motion to Enforce the Court’s Protective Order of August 14-15, 2014.

3. Attached hereto as Exhibit 1 is a true and correct copy of the DPA Crew Van News of October 3, 2014, that I received via e-mail from a Delta pilot who routinely forwards such emails to me. Information identifying the Delta pilot has been redacted from Exhibit 1 to protect the pilot's privacy, as has internal forwarding information. I maintain such emails in the ordinary course of business as Vice Chairman of the Delta MEC's Strategic Planning Committee.

Pursuant to 29 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 7, 2014

By:

A handwritten signature in blue ink, appearing to read "Michael Hanson", is written over a horizontal line.

Michael Hanson